

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

MAX MINDS, LLC,

Plaintiff,

v.

TRIANGLE EXPERIENCE GROUP, INC.,
ROBERT CLARE, JEFFREY MASE,
KEVIN MULLICAN, and JOHN DOES 1-10,

Defendants.

CAUSE NO. 1:24-cv-00779-MPB-MKK

JURY TRIAL DEMANDED

**SUPPLEMENTAL BRIEF WITH ADDITIONAL EVIDENCE IN SUPPORT OF
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff MAX MINDS, LLC by and through its undersigned counsel, hereby files this supplemental brief in support of Max Minds, LLC's ("Max") amended motion for preliminary injunction and memorandum in support thereof and states as follows:

On November 25, 2024, Max filed its amended motion for preliminary injunction and memorandum in support thereof. (ECF 104 & 105).

On December 4, 2024, counsel for Max took a limited deposition of Jeffrey Mase of Triangle Experience Group, Inc. in support of the motion. Additional support for the following facts are provided in the transcript of deposition of Jeffrey Mase ("Mase Tr.") filed concurrently:

1. Mr. Mase confirmed that TEG received and retained the source code for Max's Haptic Federal software in violation of the parties' Source Code License Agreement (SCLA). (Mase Tr. 18:15-20).

2. Mr. Mase confirmed that TEG was aware of the requirements of the SCLA that the source code be destroyed after vulnerability scanning and that the destruction be certified by TEG. (Mase Tr. 11:15-19; 22:6-18; 39:2-6).

Mr. Mase's testimony was consistent with that of Messrs. Clare and Mullican cited in the motion for preliminary injunction at ECF 105 and attached at ECF 106-2 and 106-3.

DATED: December 19, 2024

Respectfully submitted,

/s/ J. Campbell Miller

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